

# EXHIBIT 2

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP,

Plaintiff,

v.

AMAZON.COM, INC.;  
AMAZON.COM SERVICES LLC; AND  
AMAZON WEB SERVICES, INC.,

Defendants.

Case No. 7:24-CV-00030-ADA-DTG

**PLAINTIFF’S DISCLOSURE OF  
PROPOSED CLAIM CONSTRUCTIONS**

Plaintiff VirtaMove, Corp. (“Plaintiff” or “VirtaMove”) hereby provides the following disclosure of proposed constructions for the claim terms identified for construction by Defendants Amazon.com, Inc, Amazon.com Services LLC, and Amazon Web Services, Inc.. (collectively, “Defendants” or “Amazon”), as set forth below in Exhibit A. Plaintiff’s disclosure is based on currently available information, and Plaintiff reserves the right to also identify and propose constructions for any terms Defendants identify for construction, even if Defendants later determine to withdraw those terms for construction by the Court. Plaintiff reserves the right to amend, revise, and/or supplement this disclosure as additional documents and information become available, and as discovery, investigation, and meet-and-confer with Defendants’ counsel proceed.

**EXHIBIT A**

<b>No.</b>	<b>Term</b>	<b>Claim(s)</b>	<b>Proposed Construction</b>
1	shared library	'058 patent, claims 1, 2, 10	No construction necessary; plain and ordinary meaning
2	critical system elements	'058 patent, claim 1	Any service or part of a service, “normally” supplied by an operating system, that is critical to the operation of a software application.
3	functional replicas	'058 patent, claim 1	No construction necessary; plain and ordinary meaning
4	forms a part of the ... software applications	'058 patent, claim 1	No construction necessary; plain and ordinary meaning
5	disparate computing environments	'814 patent, claim 1	No construction necessary; plain and ordinary meaning
6	processor	'814 patent, claim 1	No construction necessary; plain and ordinary meaning
7	container	'814 patent, claims 1, 2, 4, 6, 8, 9, 10, 13, 14	No construction necessary; plain and ordinary meaning

Dated: October 3, 2024

Respectfully submitted,

/s/ Reza Mirzaie

Reza Mirzaie  
CA State Bar No. 246953  
Marc A. Fenster  
CA State Bar No. 181067  
Neil A. Rubin  
CA State Bar No. 250761  
Amy E. Hayden  
CA State Bar No. 287026  
Jacob R. Buczko  
CA State Bar No. 269408  
James S. Tsuei  
CA State Bar No. 285530  
James A. Milkey  
CA State Bar No. 281283  
Christian W. Conkle  
CA State Bar No. 306374  
Jonathan Ma  
CA State Bar No. 312773  
Daniel Kolko (CA SBN 341680)  
RUSS AUGUST & KABAT  
12424 Wilshire Boulevard, 12th Floor  
Los Angeles, CA 90025  
Telephone: 310-826-7474  
Email: [rmirzaie@raklaw.com](mailto:rmirzaie@raklaw.com)  
Email: [mfenster@raklaw.com](mailto:mfenster@raklaw.com)  
Email: [nrubin@raklaw.com](mailto:nrubin@raklaw.com)  
Email: [ahayden@raklaw.com](mailto:ahayden@raklaw.com)  
Email: [jbuczko@raklaw.com](mailto:jbuczko@raklaw.com)  
Email: [jtsuei@raklaw.com](mailto:jtsuei@raklaw.com)  
Email: [jmilkey@raklaw.com](mailto:jmilkey@raklaw.com)  
Email: [cconkle@raklaw.com](mailto:cconkle@raklaw.com)  
Email: [jma@raklaw.com](mailto:jma@raklaw.com)  
Email: [dkolko@raklaw.com](mailto:dkolko@raklaw.com)

Qi (Peter) Tong  
4925 Greenville Ave., Suite 200  
Dallas, TX 75206  
Email: [ptong@raklaw.com](mailto:ptong@raklaw.com)

**ATTORNEYS FOR PLAINTIFF  
VIRTAMOVE, CORP.**

**CERTIFICATE OF SERVICE**

I certify that this document is being served upon counsel of record for Defendants on October 3, 2024 via electronic service.

/s/ Christian W. Conkle